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12 Attorney for Plaintiff  
LILLIAN MUNSON  
13

14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16

17 LILLIAN MUNSON, an individual,

18  
19 Plaintiff,

20 v.

21 AT&T, a Delaware corporation, PACIFIC  
22 BELL TELEPHONE COMPANY, and DOES  
1-50,  
23

24 Defendants.  
25  
26  
27  
28

Case No.: CV 07-06470 WHA

**JOINT RULE 26(f) REPORT**

The Hon. William H. Alsup

1 On February 12, 2008, counsel representing Plaintiff Lillian Munson and  
2 Defendants AT&T Corp. and Pacific Bell Telephone Company ("Pacific Bell") met-and-  
3 conferred as required by Federal Rules of Civil Procedure 26(f). Plaintiff and Defendant  
4 AT&T Corp. hereby submit the following discovery plan:<sup>1</sup>

5  
6 (i) The parties shall exchange initial disclosures by mail on or before  
7 February 28, 2008;

8  
9 (ii) Discovery shall relate to the issues raised in Plaintiff's Complaint and  
10 Defendants' Answers thereto;

11  
12 (iii) The parties are willing to rely on paper records generated from  
13 discoverable electronically stored information, although either party may seek declarations  
14 from the other party verifying that the documents constitute true and correct reproductions of  
15 the electronically stored information maintained on the computer systems from which they  
16 are derived;

17  
18 (iv) Given the nature and temporal scope of Plaintiff's claims, Defendants  
19 anticipate Plaintiff's deposition may take three seven-hour days to complete, and therefore  
20 seek Plaintiff's agreement or a Court Order permitting same;

21  
22 (v) Non-expert discovery shall be completed by September 2, 2008;

23  
24 (vi) Expert disclosures and reports shall be completed by December 16,  
25

26 <sup>1</sup> Defendant Pacific Bell has recently accepted service of the Plaintiff's First Amended Complaint and  
27 will be appearing in this action shortly. However, as Pacific Bell has yet to appear in this action, it is  
28 not a party to this Joint Rule 26(f) Report. Nonetheless, Pacific Bell has been consulted regarding  
the contents of this Report and has agreed to the dates contained herein.

2008;

(vii) Expert discovery shall be completed by February 17, 2009; and

(viii) Last day to join parties and/or amend pleadings is April 30, 2008.

DATED: February 28, 2008

By /S/  
Janine S. Simerly  
Attorney for Defendants  
AT&T CORP. and PACIFIC BELL  
TELEPHONE COMPANY

DATED: February \_\_, 2008

By   
Waukeen Q. McCoy  
Attorney for Plaintiff  
LILLIAN MUNSON

MULLER LAW GROUP  
A PROFESSIONAL CORPORATION  
LARKSPUR, CALIFORNIA

1 2008;

3 (vii) Expert discovery shall be completed by February 17, 2009; and

5 (viii) Last day to join parties and/or amend pleadings is April 30, 2008.

7 DATED: February \_\_, 2008

8 By \_\_\_\_\_

9 Janine S. Simerly  
10 Attorney for Defendants  
AT&T CORP. and PACIFIC BELL  
TELEPHONE COMPANY

12 DATED: February 28, 2008

13 By \_\_\_\_\_

14 Waukeen Q. McCoy  
15 Attorney for Plaintiff  
LILLIAN MUNSON

16 DOWN-PATTON